

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**No. 2:15-cr-04268-JB**

**ANGEL DELEON, et al.,**

**Defendants.**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
DISCOVERY MOTION**

Defendant Anthony Ray Baca respectfully requests an extension of one day within which to file his motion to compel discovery. As grounds for this request, Mr. Baca states as follows:

1. Pursuant to this Court's Order extending the deadline for the parties to file their discovery motions, those motions were due Friday, September 15, 2017. [Doc. 1241.]

2. Last week, several urgent matters arose in this case and others that took Mr. Baca's counsel away from their work on his motion to compel discovery. Counsel realized late last Friday that they could not competently complete the motion by midnight. Thus, they contacted counsel for the United States to ask their position on a one-day extension of time within which to file. Counsel for the United States stated they had no objection.

3. Undersigned counsel has also conferred with counsel for the other defendants regarding this motion. Defendants Daniel Sanchez and Arturo Garcia join this motion. The other defendants have indicated no objection.

**CONCLUSION**

For the foregoing reasons, Defendant Anthony Ray Baca respectfully requests a one-day extension of time within which his motion to compel discovery.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 18th day of September 2017, I filed the foregoing pleading electronically through the CM/ECF system, which caused counsel for Plaintiff and Defendants to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Theresa M. Duncan  
Theresa M. Duncan